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December 10, 2018

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OUR FILE NO. 180480 -01

Via ECF

Hon. Claire C. Cecchi, U.S.D.J.  
United States District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Ramapough Mountain Indians, Inc. v. Township of Mahwah, et al.,  
Case No. 2:18-cv-09228-CCC-JBC**

Dear Judge Cecchi:

Please be advised that we represent the Ramapo Hunt & Polo Club Association, Inc., a non-profit corporation of the State of New Jersey comprised of 29 homeowners.

This joint status letter is being submitted by counsel for plaintiffs Ramapough Mountain Indians, Inc., and Ramapough Lenape Nation (together, "Plaintiffs"); counsel for defendant Ramapough Hunt & Polo Club Association, Inc. ("Association"); and counsel for defendants the Township of Mahwah, Geraldine Entrup and Thomas Mulvey ("Municipal Defendants"), which, together, constitute the named parties in the above-referenced matter.

As per this Court's Text Order dated October 16, 2018 [ECF#62], discovery and motion practice in this matter was stayed to allow the parties to engage in meaningful mediation. Unfortunately, and despite praiseworthy and substantial efforts by mediator Sheryl M. Goski, Esq. (who made herself available 24/7, exchanging emails at all hours and over many weekends), the mediation efforts have not been successful. A final attempt during a telephone conference Thursday, December 6, was not successful, and the mediation has ended. While it is anticipated that the parties will continue settlement discussions as and when appropriate, the parties currently believe that the most productive means towards resolution would be for the litigation now to proceed in the normal course.

*Forty-Eight Years of Service*

Hon. Claire C. Cecchi, U.S.D.J.  
December 10, 2018  
Page 2

The parties, therefore, respectfully request that Your Honor lift the stay; administratively reinstate Plaintiffs' Motion to Amend the Complaint (which was recently dismissed because of the stay); set new briefing schedules for said motion; and amend the discovery schedule. To that end, the parties respectfully propose the following briefing schedule for Plaintiffs' pending Motion to Amend the Complaint and adjustments to the Pretrial Scheduling Order.

**I. Plaintiffs' Motion to Amend the Complaint [ECF#42]**

On September 21, 2018, Plaintiffs moved to Amend/Correct the Complaint ("Motion to Amend"). Upon the filing of this motion, this Court administratively terminated two pending motions to dismiss [see ECF#45], which had been filed by the Association and the Municipal Defendants, respectively. See ECF##28 and 29.

On September 25, 2018, the Clerk's Office made Plaintiffs' Motion to Amend returnable on October 15, 2018. See CM/ECF Docket Entry. On September 26, 2018, counsel for the Association and the Municipal Defendants each submitted Rule 7.1(d)(5) Letters seeking an automatic extension of the motion return date. See ECF##49 and 50. Accordingly, the Clerk's Office adjourned the return date to November 5, 2018. See CM/ECF Docket Entry. Under this new return date, the Association's and the Municipal Defendant's opposition papers would have been due October 22, 2018. However, on October 16, as discussed above, all motion practice in this matter was stayed. On December 6, the Plaintiffs' Motion to Amend the Complaint was administratively dismissed.

The parties respectfully request that Plaintiffs' Motion to Amend be reinstated and set for February 19, 2019, with opposition papers due January 23, 2019 and reply papers due February 13, 2019.

**II. Discovery**

On September 25, 2018, the Hon. James B. Clark, III, U.S.M.J., entered the Pretrial Scheduling Order ("PSO") governing, among other things, the discovery in this litigation. See ECF#48. As per this Court's October 16, 2018 Order, discovery has been stayed. In the interim, several of the deadlines set forth in the PSO have passed. The parties would propose that all dates set forth in the PSO be adjourned 70 days (*i.e.*, ten weeks).

Please do not hesitate to contact us if you have any questions.

Respectfully submitted,

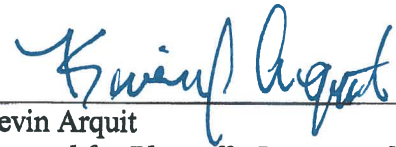


John J. Lamb  
Counsel for Defendant, Ramapo  
Hunt & Polo Club Association, Inc.

Hon. Claire C. Cecchi, U.S.D.J.  
December 10, 2018  
Page 3

*/s/ Ruby Kumar-Thompson*

Ruby Kumar-Thompson  
*Counsel for Defendants, Township of  
Mahwah, Geraldine Entrup, and  
Thomas Mulvey*

A handwritten signature in blue ink, appearing to read "Kevin Arquit", written over a horizontal line.

Kevin Arquit  
*Counsel for Plaintiffs, Ramapough  
Mountain Indians, Inc., and  
Ramapough Lenape Nation*

cc: Counsel of Record (*via ECF only*)